



February 16, 2021

## MEMO ENDORSED

**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Joshua Pantojas,*  
21-cr-45-LAK

Dear Judge Kaplan:

On behalf defendant Joshua Pantojas, I submit this letter in support of Mr. Pantojas's motion, pursuant to 18 U.S.C. § 3145(b), to revoke the detention order previously entered by Magistrate Judge Stewart D. Aaron following Mr. Pantojas's arrest on January 22, 2021.

Mr. Pantojas has been charged in this case with Hobbs Act Robbery arising out of alleged robberies that overlap with and are substantially similar to robberies that were initially charged by New York State in January 2020. Mr. Pantojas was released on bail in connection with those state charges, and was close to resolving the charges with a misdemeanor when the federal government intervened and decided to charge Mr. Pantojas federally. The federal government now seeks to detain Mr. Pantojas, a 21-year old who has previously only been convicted of non-violent juvenile offenses, in the midst of a pandemic under harsh conditions that compromise his ability to meaningfully consult with his attorneys about his case. Detention here is not necessary, because Mr. Pantojas can be released on conditions that will ensure that he is not a flight risk or a danger to the community.

Mr. Pantojas, who has lived in the Bronx nearly all of his life, has strong ties to the community, including loving and supportive parents who would co-sign a bond for him, and a three-year-old daughter with whom he is extremely close. Mr. Pantojas also has older, supportive sisters in [REDACTED]. Mr. Pantojas has previously stayed with his sister in [REDACTED], and could live there again under strict home detention. Mr. Pantojas thus has strong, lifelong ties to the Tristate area that ensure he is not a flight risk.

The proposed conditions would also ensure that Mr. Pantojas is not a danger to the community. His sister's home is approximately an hour and a half drive from the neighborhood in the Bronx where the alleged conduct took place, so Mr. Pantojas would be far from any negative influences in the Bronx under strict supervision. He would also be living in a single-family home, and not a dense multi-story apartment building, alleviating any concerns expressed by the Government at Mr. Pantojas's initial bail hearing that it would be difficult to monitor his

*Denied for reasons  
stated on tape record*  
SO ORDERED

*Lewis A. Kaplan, U.D.J.*  
LEWIS A. KAPLAN, U.D.J.

*✓ 2/22/21*